

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MANUEL BOLIVAR, ANDRES RUBIO and
JANNETH QUINTERO, individually and on behalf
of all those persons similarly situated,

Plaintiffs,

v.

FIT INTERNATIONAL GROUP CORP., FOREX
INTERNATIONAL TEAM INC., JAIRO
ENRIQUE SANCHEZ, and DILIA MARGARITA
BAEZ,

Defendants.

Case No.: 12-CV-00781

PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

Plaintiffs, Manuel Bolivar, Andres Rubio And Janneth Quintero (collectively "Class Representatives"), respectfully move the Court for an order pursuant to Rules 23(a) and 23(b)(3) of the Federal Rules of Civil Procedure, appointing them class representatives and certifying this action as a class action on behalf of a class (the "Class"), consisting of all investors who invested funds for trading in foreign currency with Defendants Jairo Enrique Sanchez ("Sanchez") and Margarita Baez ("Baez") through their purported corporation and/or limited liability company FIT International Group; Defendants FIT International Group Corp. and/or Forex Investment Team Inc. (collectively "FIT"), as well as other foreign corporate entities, between January 1, 2000 and August 25, 2009 inclusive (the "Class Period") who suffered a net loss of principal invested in the scheme. Plaintiffs submit the accompanying memorandum in support of this motion.

October 31, 2014

Respectfully submitted,

By: /s/ Dr. Gaytri D. Kachroo
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